

EXHIBIT 6

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF CALIFORNIA

3

4 MATTHEW PETERSON, SADIE
5 FLODING, COLIN STRUB, CARSON
6 BRENDA, JODY BARRY, TEISCHA
BENSON, LYNNETTA KLAM, and
LORI DAVIES

**CERTIFIED
TRANSCRIPT**

7 Plaintiffs,

8 vs.

No. 1:22-cv-00701 JLT-CDB

9 THOMSON INTERNATIONAL,
10 INCORPORATED, a California
11 corporation; DOES 1-10,
INCLUSIVE; and ROE ENTITIES
1-10, INCLUSIVE,

12 Defendants.

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18 REMOTE DEPOSITION OF LYNNETTA KLAM

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20 Taken before LISA LOUNDAGIN

21 Certified Shorthand Reporter

22 State of California

23 CSR 9213

24 Friday, January 19, 2024

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1 REMOTE DEPOSITION OF LYNNETTA KLAM

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3 BE IT REMEMBERED that pursuant to Notice of
4 Taking Deposition, and on Friday, January 19, 2024,
5 commencing at the hour of 10:03 a.m., via Zoom
6 videoconference, before me, LISA LOUNDAGIN, CSR No. 9213,
7 a Certified Shorthand Reporter in and for the State of
8 California, virtually appeared

9 LYNNETTA KLAM,

10 produced as a Plaintiff in the above-entitled action, who
11 being by me first duly sworn, was thereupon examined as
12 a witness in said action.

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1 Lindsay is my lawyer now.

2 **Q What are you suing Thomson for in this lawsuit?**

3 MS. LIEN: Objection. Foundation. Go ahead,
4 Lynnetta.

5 THE WITNESS: I got really, really sick, really,
6 really sick, and I don't think I've ever totally
7 recovered. So I guess I'm hoping for some kind of
8 compensation for that, the pain and suffering.

9 MS. CHEN: Q. Anything else?

10 A No.

11 **Q Are you also suing Thomson in Canada?**

12 MS. LIEN: Objection. Foundation. Go ahead,
13 Lynnetta.

14 THE WITNESS: No.

15 MS. CHEN: Q. Are you a member of a class
16 action lawsuit in Canada against my client?

17 MS. LIEN: Same objection. Whenever I object,
18 you can just answer. There's no judge to decide so --

19 THE WITNESS: Okay. Not that I'm aware of.
20 Nobody has ever contacted me in Canada about a class
21 action suit here in Canada.

22 MS. CHEN: Q. Are you aware of a class action
23 lawsuit in Canada against my client?

24 A I am not part of it. If there's -- if that is
25 going on, I'm not aware.

1 Q Who is Doris Klam?

2 A My mother.

3 Q What does your mother know about your damages?

4 A She knows that I was really sick, as well, yeah.

5 Q Anything else?

6 A No.

7 Q Could you tell me when you had sickness in July
8 2020?

9 A Like what symptoms did I have?

10 Q I was talking about the onset of your symptoms.
11 When did it start?

12 A Oh, I think the 9th. I was coming back from
13 Lacombe, and then the fever hit. And that was when COVID
14 was really big, and I thought -- that was my thought is
15 that I had COVID. But I pulled over to the side of the
16 road, and I actually considered calling an ambulance
17 'cause I was that -- like it just hit me really quick.

18 But because of the COVID, they -- they told me
19 not to go to the hospital, so I stayed at home and had a
20 fever of, like, 40 and diarrhea and -- for -- till,
21 finally, I went to the hospital in Leduc.

22 Q I want to get the timeline straight.

23 A Okay.

24 Q When did you have the dinner with pizza with
25 your family?

1 these stomach pains and diarrhea, which didn't quite fit
2 with the COVID thing. So I ended up calling my regular
3 doctor on the 14th, and he said, "I'm gonna call Leduc
4 Hospital and get them to make a bed for you. You go there
5 right away."

6 **Q Did you pay any deductibles for your insurance**
7 **with Alberta Health Care?**

8 A Well, I know you -- like you're an American, and
9 it's a very different system. But, no, here there is no
10 deductibles. There is no -- you don't need extra
11 insurance. We're just -- we -- Alberta Health Care's got
12 you, so it doesn't cost you anything.

13 **Q Do you have to pay out of pocket for any of your**
14 **medical bills?**

15 A No. I have to pay for, like, if I get a
16 prescription, but, no, no, I -- not to go to the doctor or
17 go to the hospital, no.

18 **Q Did you pay for any prescriptions because of**
19 **your illness in this lawsuit?**

20 A I might have.

21 **Q Do you have receipts for the prescriptions?**

22 A Well, I always go to the same pharmacy, so they
23 might have a record of them.

24 **Q What's the name of the pharmacy you went to?**

25 A Shoppers Drug Mart on James Mowatt Trail.

1 T3B 0B2.

2 Q When you say regular doctor, does that mean your
3 family doctor?

4 A Yes.

5 Q Other than Dr. Lau and Dr. Gaunt, have you seen
6 any other family doctors since July 2020?

7 A No.

8 Q Did you go to Leduc Hospital on July the 14th,
9 2020?

10 A I did.

11 Q How'd you get there?

12 A I drove myself, yeah.

13 Q How long did you stay at Leduc Hospital?

14 A I think it was a couple days. I'm pretty sure.

15 Q Did you go there on July the 14th?

16 A Yes.

17 Q Which doctor saw you at Leduc Hospital?

18 A I don't remember, dear.

19 Q Could you tell me what happened when you got to
20 the hospital?

21 A Yeah, they quarantined me in a little room
22 before they could find me a bed, and then they just did
23 some tests on me and got an IV with some electrolytes or
24 whatever and just kind of stabilized me, yeah.

25 Q What kind of tests did you end up getting?

1 A Yeah.

2 Q Could you describe your diarrhea symptoms before
3 and after Leduc?

4 A It was a weird color. It was, like, green. I
5 don't know. Yeah, it was just -- I don't know what to
6 tell you. I mean, diarrhea is diarrhea. Like loose
7 stool, not being able to control your bowel movements. It
8 was a very off color. It was, like, green. I don't know
9 what else I can tell you.

10 Q I'm talking about your symptoms before and after
11 your Leduc stay. What were the symptoms before your Leduc
12 stay?

13 A Well, I had diarrhea before my Leduc stay. I
14 think it probably cleared up within a few days after I got
15 home, if I remember correctly.

16 Q Did you take any of the medications prescribed
17 by a doctor?

18 A Well, if they prescribed me something, I would
19 have taken it. I'm a pretty good patient.

20 Q After Leduc did you seek medical treatment
21 again?

22 A Well, it seemed like my innards, like, had a
23 hard time sorting themselves out. Like sometimes they'd
24 be good, and then sometimes not so good. So I did request
25 to see a specialist, a gastroenterologist specialist, and

1 interesting but nothing really to explain the symptoms
2 that I was having.

3 Q What did Dr. Todoruk say about your symptoms?

4 A He suggested that I manage it with diet, which
5 I've been able to do pretty well.

6 Q Did you change your diet?

7 A Yeah.

8 Q When you say you managed it pretty well, did you
9 say -- does that mean you managed the diarrhea pretty
10 well?

11 A Well, it comes and goes. So sometimes, you
12 know, I have bouts of it, and then sometimes I have
13 periods where I'm fine.

14 Q Did you see Dr. Todoruk by telephone, or did you
15 see him in person?

16 A Telephone.

17 Q Did you ever meet Dr. Todoruk physically?

18 A I did not, no.

19 MS. LIEN: Helen, do you mind if we take a brief
20 restroom break?

21 MS. CHEN: That's fine. We'll be back at 11:12.

22 THE WITNESS: Okay.

23 MS. LIEN: Sounds good.

24 (Recess taken from 11:02 to 11:12 a.m.)

25 MS. CHEN: Back on the record.

1 probably 18 months ago.

2 Q Could you describe for me whether your symptoms
3 resolved at the end of 2020?

4 A No, they're still -- I still deal with it.

5 Q When you say you still deal with, can you
6 describe your symptoms now?

7 A Yeah. On January 6th I was visiting a family
8 member in the hospital, and on my way to my car I crapped
9 my pants. So, yeah, it's a little bit funny, but it's
10 not.

11 Q When you say January 6th, 2020 -- is it 2020 or
12 2024?

13 A 2024.

14 Q How old are you now?

15 A Sixty-five.

16 Q Do people's digestive symptoms get worse when
17 they age?

18 A I don't think my age has anything to do with it.

19 Q Did any of your doctors attribute your current
20 symptoms to your Salmonella illness in 2020?

21 MS. LIEN: Objection. Foundation. Go ahead,
22 Lynnetta.

23 THE WITNESS: Well, Dr. Todoruk said that
24 Salmonella poisoning could have caused the symptoms that I
25 was experiencing.

1 A Yes.

2 Q Have you found the four pages of relevant
3 documentation during the break?

4 A I did not, no.

5 Q What damages are you seeking in the lawsuit?

6 MS. LIEN: Objection. Foundation. Go ahead,
7 Lynnetta.

8 THE WITNESS: Personally, if I could get some
9 sort of compensation for pain and suffering, but even if I
10 don't get anything, if I can help make it -- make the
11 standards that we have for our food in our country a
12 little better, then I would consider a job well done.

13 MS. CHEN: Q. And when you say "in our
14 country," which country are you talking about?

15 A Well, North America, okay.

16 Q And there's more than one country in North
17 America. Which country are you talking about?

18 A This particular instance it was just Canada and
19 the United States so --

20 Q Are you seeking psychological care damages in
21 this lawsuit?

22 A No.

23 Q Are you seeking emotional distress damages in
24 this lawsuit?

25 MS. LIEN: Object to the form and foundation.

1 Go ahead, Lynnetta.

2 THE WITNESS: Well, you asked me about stress a
3 while ago, and it's not always just, like, stress that's a
4 negative thing. It could be stress that's a good thing.
5 But I missed a lot of my -- Ashley's son's first birthday.
6 Like I was -- we wanted to make it a really big deal
7 'cause we don't know how many birthdays he's gonna have,
8 and so I was working a few days ahead of time to prepare
9 and then travelled, but I spent a good bit of the day in
10 the basement in the bathroom. So, yeah, that -- that was
11 emotionally distressful.

12 MS. CHEN: Q. How many children does Ashley
13 have?

14 A Just the one son.

15 Q What's his birthday?

16 A June 30. He's two and a half, so 2021 or 2022.
17 What is it?

18 Q But you had your Salmonella illness back in July
19 2020, right?

20 A He wasn't born yet.

21 Q And you did not have Salmonella illness in June
22 2022, right?

23 A Well, it's -- I have trouble with my bowels.
24 They come and -- it comes and goes. And that's happened
25 for the last three and a half years, like whether it's

1 Salmonella or not, but I didn't have it before.

2 Q Are you attributing your missing your grandson's
3 birthday to Salmonella illness?

4 MS. LIEN: Objection.

5 THE WITNESS: Yes --

6 MS. LIEN: Foundation.

7 THE WITNESS: -- I think they're related.

8 MS. CHEN: Q. Have you experienced emotional
9 distress before July 2020?

10 MS. LIEN: Object to the form.

11 THE WITNESS: Life has stress, but I didn't miss
12 out 'cause I was crapping my drawers before July. That
13 didn't happen. Now it does on occasion.

14 MS. CHEN: Q. This is a yes/no question. Did
15 you have emotional distress prior to July 2020.

16 MS. LIEN: Object to the form. Go ahead,
17 Lynnetta.

18 THE WITNESS: Life has stress, yes. Everybody
19 has stress.

20 MS. CHEN: Q. Again, I'm not looking for a
21 narrative. I'm looking for a yes/no answer.

22 MS. LIEN: She said yes.

23 MS. CHEN: Well, she said life has stress, so I
24 don't know whether the life has stress corresponds to
25 emotional distress before July 2020 or not, so I want a

1 **Q As you sit here, have your emotional distress**
2 **symptoms caused by Salmonella resolved?**

3 MS. LIEN: Objection. Foundation. Go ahead.

4 THE WITNESS: Well, I don't think so. That
5 would be great if they did, but I don't -- I don't have
6 evidence of that.

7 MS. CHEN: Q. As you sit here today, could you
8 list the emotional distress symptoms you have today?

9 A Well, I don't know if it's emotional distress,
10 but it's -- it gets in the way of my life when I have to
11 be on the toilet, and I can't go out of my house 'cause I
12 need to stay close by, or when I'm out and about, and all
13 of a sudden something happens, and then I end up being
14 embarrassed. I carry Depends in my car. I carry paper
15 towels in my car. But it's not depression. It's just
16 frustrating.

17 **Q I'll have five minutes to review my notes and be**
18 **back at 2:05.**

19 A That's, like, in seven minutes?

20 **Q Yeah, seven minutes.**

21 A Okay, great.

22 (Recess taken from 1:59 to 2:04 p.m.)

23 MS. CHEN: Back on the record.

24 **Q Ms. Klam, did you seek treatment at Royal**
25 **Alexandra Hospital in July -- in August 2020 for**